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United States
Environmental Protection
Agency

Region 10
Hanford Project Office
712 Swift Boulevard, Suite 5
Richland WA 99352

9200574



January 13, 1992

Steven H. Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550, A5-19
Richland, Washington 99352

Re: Comments on the 200 West Area Carbon Tetrachloride Expedited
Response Action (ERA) Phase II Evaluation Work Plan

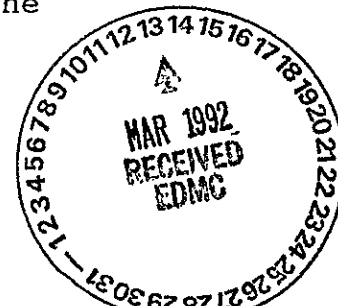
Dear Mr. Wisness:

The U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) have completed the review of the "200 West Area Carbon Tetrachloride Expedited Response Action Phase II Site Evaluation Work Plan". EPA and Ecology consider the Phase II Site Characterization Activities to be an important part of the ERA project. These investigations should help to refine the site conceptual model and improve carbon tetrachloride recovery. In addition, this effort will supply important data to establish a baseline distribution of carbon tetrachloride in the unsaturated zone and to assess the effectiveness of vapor extraction for stabilizing the existing carbon tetrachloride plume.

EPA and Ecology consider the level of detail in the Phase II plan appropriate for gathering field screening data and other on-site laboratory data. We recognize actual sampling locations may require continual modification based on field results. This level of detail is not consistent with requirements of an RI/FS process, but this characterization plan will not be the sole source of data to support risk assessment or remedial design.

On September 24, 1991, EPA and Ecology provided prior approval for the cone penetrometer feasibility testing and in a following ERA Weekly Interface meeting on the October 2, 1991, EPA agreed to the initiation of the pipeline integrity survey. This letter provides formal approval for the remainder of the Phase II Characterization plan.

EPA and Ecology have enclosed a few general comments that require your consideration during the Phase II characterization effort. Those comments focus on technical aspects of the drilling and sampling task.



S. H. Wisness

-2-

January 13, 1992

Please feel free to contact me with any questions. I can be reached at (509) 376-9529.

Sincerely,



Douglas R. Sherwood
Unit Manager

Enclosure

cc: Steve Cross, Ecology
Julie Erickson, DOE
Wayne Johnson, WHC
Darci Teel, Ecology
Administrative Record (200-ZP-1 Operable Unit)

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GENERAL COMMENTS

EPA and Ecology are primarily concerned with the potential to create preferential flow paths to and through the groundwater due to the drilling of additional wells and boreholes for monitoring, sampling, and vapor extraction. EPA and Ecology would like to ensure that drilling of these wells does not increase the spread of contaminants beneath the 200 West Area. Of primary concern is the installation of four new wells in the area around the three carbon tetrachloride disposal sites. EPA and Ecology acknowledge that the locations for these wells should not be established without certain screening data to be gathered as part of the Phase II Evaluation Work Plan, but we do suggest that the following information be addressed prior to initiation of drilling.

1. Location

The drilling locations selected are compared to the known extent of perched water to ensure to the best of our ability that a direct pathway is not created between the perched water zone beneath the 200 West Area and the unconfined aquifer.

2. Well Construction

Due to the nature and extent of contamination present in the 200 West Area and the acknowledgement that one purpose in drilling these wells may be to provide additional vapor extraction locations, it is important to develop well or borehole seals that inhibit contaminant transport while meeting its designed purpose.

EPA and Ecology would like to review the details of well construction for these new wells, especially if their design, construction, and final completion is significantly different than other wells drilled for the purpose of groundwater monitoring. Of particular concern is the deep well which is to be drilled to the top of the basalt. Construction detail on this well is required prior to penetration of the unconfined aquifer.

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Correspondence No.

Incoming 9200574

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